

# **EXHIBIT AY**

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03-MD-1570 (GBD)(FM) ECF Case
---	----------------------------------

This document relates to:

*Ashton, et al. v. Al Qaeda Islamic Army, et al.* No. 02-CV-6977  
*Burnett, et al. v. Al Baraka Investment & Development Corp., et al.*, No. 03-CV-5738  
*Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al.*, No. 04-CV-05970  
*Euro Brokers v. Al Baraka Investment and Development Corp., et al.*, No. 04-CV-7279  
*Estate of O'Neill, et al. v. Al Baraka Investment and Development Corp., et al.*, No. 04-CV-1923  
*Federal Insurance Col, et al. v. Al Qaida, et al.*, No. 03-CV-6978

DECLARATION OF IBRAHIM SULAYMAN ADBULLAH

I, Ibrahim Sulayman Abdullah, being duly sworn, hereby declare under penalty of perjury that the following is true and correct:

1. I am not a party in the above captioned matter.
2. I am a citizen of Saudi Arabia.
3. I have a Bachelor's of Science degree in Industrial Engineering from King Abdul-Aziz University, Jeddah, Saudi Arabia; a Master's Degree in Computer Science from The George Washington University, Virginia, United States (1991 - 1994); and a Ph.D. in Information Technology from George Washington University, Virginia, United States (1999-2004). Between my Master's degree and my Ph.D. (1994-1999), I travelled back and forth between the United States and Saudi Arabia.
4. I first learned about the World Assembly of Muslim Youth, USA ("WAMY USA"), also known as WAMY International, in 1992, while studying at George Washington University during my Master's program. I attended some of WAMY's camps, religious

21. WAMY USA received the comprehensive budget for North America operations from WAMY Saudi Arabia. WAMY USA then divided the funds according to the budget and operations for both WAMY USA and WAMY Canada.
22. WAMY Canada was required to submit its project proposals to WAMY USA. If the projects were small, WAMY USA would approve them and fund them directly. If the projects were large, WAMY USA would send the proposal to Riyadh for approval by WAMY Saudi Arabia.
23. WAMY Canada received its monthly budget monies from WAMY USA. This money funded WAMY Canada's activities, which included educational programs, lectures, financial assistance to Muslim youth, funding for Muslim activities, donations to food and clothing banks, and financial assistance to help improve Muslim communities.
24. During the early years of my tenure as the Director of WAMY USA, I had a difficult time with WAMY Canada.
25. In 2000, I asked Mohamad Al Khatib to serve as the volunteer Director of WAMY Canada. I thought he was a good person with no ill intentions. I knew, however, that in 1999, Abdullah Bin Laden had terminated Mr. Al Khatib due to his poor organizational skills and lack of reporting back. Nonetheless, I never thought Mr. Al Khatib would do anything that would put WAMY at risk; hence I asked him to come serve WAMY Canada.
26. While Mr. Al Khatib was the Director of WAMY Canada on a voluntary basis, he was the only person with whom I worked.
27. Soon after retaining Mr. Al Khatib, I got to experience his bad organizational skills that initially resulted in his 1999 termination by Abdullah Bin Laden. He would not report

back on his activities nor provide explanations for how funds were spent. Additionally, instead of contacting WAMY USA for WAMY Canada's budget, he would attempt to contact WAMY Saudi Arabia directly. WAMY USA and WAMY Saudi Arabia directed him on several occasions to contact WAMY USA for WAMY Canada's funding, to no avail.

28. As a result of his failure to report back, in or around 2000, WAMY USA stopped sending funds to WAMY Canada.

29. Later on, I do not recall the date, I became aware that Mr. Al Khatib had complained to WAMY Saudi Arabia that WAMY USA was not funding WAMY Canada projects. However, he never explained to WAMY Saudi Arabia that the reason compelling WAMY USA to withhold the funds was WAMY Canada's failure to report back.

30. Mohamad Al Khatib never visited WAMY USA, and I never visited WAMY Canada.

31. In early March 2001, I learned that Mohamad Al Khatib, while representing WAMY Canada, was wearing many hats and was confusing the public which organization he was representing. I heard, for instance, he was representing the Muslim World League ("MWL") and confusing the two organizations when he spoke to people and conducted activities.

32. Therefore, I communicated this to WAMY Saudi Arabia via a letter addressed to Dr. Saleh Baeber because it was wrong of Mr. Al Khatib to represent other organizations while representing WAMY or to fundraise for other organizations.

33. Upon this complaint, WAMY Saudi Arabia requested that I ask Mr. Al Khatib to resign.

34. On March 17, 2001, I sent a letter to Mohammed Al Khatib asking him to resign. On March 20, 2001, Al Khatib resigned from WAMY Canada.